## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF WISCONSIN

RICKEY I. KANTER,	)
Plaintiff, v.	) Civil Action No. 16-cv-01121
LORETTA ELIZABETH LYNCH, Attorney General of the United States, and BRAD SCHIMEL, Attorney General of the State of Wisconsin,	) ) ) )
Defendants.	) ) )

## **CONSENT MOTION FOR EXTENSION OF TIME**

On August 22, 2016, Plaintiff filed a Complaint in the above-referenced matter. ECF No.

1. The response of Defendant Loretta Lynch, Attorney General of the United States in her official capacity, is presently due October 24, 2016. Defendant, by and through undersigned counsel, respectfully move the Court for an extension of time to respond to the Complaint so that a response would be due November 11, 2016.

Defendant requests an extension of time because the parties have agreed on a tentative briefing schedule which will be set forth via a letter from Plaintiff to this Court. The agreed-upon date for dispositive motions to be filed by either defendant is November 11, 2016. The parties concur that the briefing schedule will enable the case to move forward in an efficient and organized manner.

No prior extension of this deadline has been requested. Moreover, all parties have consented to this request for an extension of time.

For the foregoing reasons, Defendant respectfully requests that the Court grant its consent

motion for an extension of time – until November 11, 2016 – to respond to the Complaint. A proposed Order is attached.

Respectfully submitted this 21st day of October, 2016,

BENJAMIN C. MIZER Principal Deputy Assistant Attorney General

JOHN R. TYLER Assistant Branch Director

/s/ Michael L. Drezner
MICHAEL L. DREZNER
VA Bar #: 83836
Trial Attorney, U.S. Department of Justice Civil Division, Federal Programs Branch
20 Massachusetts Avenue, NW
Washington, DC 20530
Telephone (202) 514 4505

Telephone: (202) 514-4505 Facsimile: (202) 616-8470 Counsel for Defendant

## **CERTIFICATE OF SERVICE**

I hereby certify that on October 21, 2016, a copy of the foregoing Motion was filed electronically via the Court's ECF system, which effects service upon counsel of record.

/s/ Michael L. Drezner
Michael L. Drezner